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**Attorneys for Plaintiff Lisa Black**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

<b>LISA BLACK,</b>	)	<b>CIVIL ACTION NO. 05-0038</b>
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	
	)	<b>SECOND MOTION TO COMPEL</b>
<b>JIM BREWER, individually and in his</b>	)	
<b>official capacity as Acting Principal for</b>	)	<b>Date: August 24, 2006</b>
<b>Hopwood Junior High School,</b>	)	<b>Time: 9:00 a.m.</b>
<b>COMMONWEALTH OF THE NORTHERN</b>	)	<b>Judge: Munson</b>
<b>MARIANA ISLANDS PUBLIC SCHOOL</b>	)	
<b>SYSTEM, and JOHN AND/OR JANE DOE,</b>	)	
	)	
<b>Defendants.</b>	)	

Plaintiff, by and through counsel and pursuant to Fed.R.Civ.P. 37 and LR 16.2CJ(d)(1), hereby moves this honorable Court for an Order compelling Defendant CNMI Public School System ("PSS") to serve upon Plaintiff an amended response to Plaintiff's Second Set of Interrogatories and Request for Admissions and Special Interrogatory. Plaintiff also moves, pursuant to the aforementioned rules, for an Order compelling Defendant Jim Brewer ("Mr. Brewer") to serve upon Plaintiff an amended response to Plaintiff's Third Set of Production of Documents, Third Set of Interrogatories and Request for Admission and Special Interrogatory. The initial responses by PSS and Mr. Brewer are unresponsive and/or improperly withhold information or documents as explained in more detail in Plaintiff's Memorandum In Support of

1 this Motion filed herewith. Therefore, Plaintiff moves this Court for an Order compelling PSS  
2 and Mr. Brewer to provide responsive answers and/or documents in response to these various  
3 discovery requests and to pay the costs and attorney fees associated with bringing this Motion.  
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6 Respectfully submitted this 7<sup>th</sup> day of August, 2006:

7 O'CONNOR BERMAN DOTTS & BANES  
8 Attorneys for Plaintiff Lisa Black

9 By: /s/ \_\_\_\_\_  
10 GEORGE L. HASSELBACK  
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